IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF PUERTO RICO

IN RE: CASE NO. 14-03824 EAG

EUDELIZ SANTIAGO RODRIGUEZ

Debtors CHAPTER 13

BANCO POPULAR DE PR

Movant

INDEX:

Vs

EUDELIZ SANTIAGO RODRIGUEZ CHAPTER 13 TRUSTEE JOSE R. CARRION MORALES

DEBTOR'S REPLY TO CREDITOR'S SECTION 362 MOTION

TO THE HONORABLE COURT:

NOW COMES debtor herein, Eudeliz Santiago Rodríguez, by her undersigned attorney and very respectfully ALLEGES AND PRAYS:

- 1. Creditor Banco Popular of Puerto Rico filed a motion under section 362 requesting the Relief from Stay.
- Debtors filed bankruptcy petition on May 12, 2014. Creditor registered the mortgage loan
 or at least presented the documents in order to perfect the secured status of their claim on
 May 27th, 2014 this is 15 days after the petition was filed.
- Creditor has an unsecured claim registered under their name. In fact, the property is
 registered under Del Carmen Residence Development, Inc not debtor. Please refer to the
 title search included with creditor's proof of claim.
- 4. Debtor is filing an objection to claim in order to object classification of creditor's claim.
- 5. It is requested that the Motion for Relief for Stay be denied as filed.

WHEREFORE, debtor respectfully requests that the *Motion for Relief from Stay* be denied by the Honorable Court and all other remedies which are proper and just be granted.

HEREBY CERTIFY on this same date I electronically filed the foregoing document with the clerk of the court using the CM/ECF System which will sent notification of such filing to: Chapter 13 Trustee, José R. Carrión Morales; Carlos G. Batista Jiménez Esq., Banco Popular of Puerto Rico's legal representative and to all creditors registered to said system. On this date, I have sent copy of said document by regular mail to all parties in interest that are non CM/ECF participants as of the creditor matrix attached hereto.

IN SAN JUAN, Puerto Rico this 25 day of August, 2014.

MODESTO BIGAS LAW OFFICE

Attorneys for Debtor P.O. Box 7462 Ponce, P.R. 00732-7462 Tel. 844-1444; Fax 842-4090

By: /s/ Alexandra Bigas Valedon
ALEXANDRA BIGAS VALEDON
U.S.D.C. NO. 220109
alexandra.bigas@gmail.com

14-03824-EAG13 EUDELIZ SANTIAGO RODRIGUEZ

Case type: bk Chapter: 13 Asset: Yes Vol: v US BANKRUPTCY JUDGE: EDWARD A GODOY Date filed: 05/12/2014 Date of last filing: 08/22/2014 Plan confirmed: 07/11/2014

Creditors

ALEXANDRA BIGAS VALEDON P O BOX 7462 PONCE PR 00732	(3925841) (cr)
American InfoSource LP as agent for Midland Funding LLC PO Box 268941 Oklahoma City, OK 73126-8941	(3929977) (cr)
BANCO POPULAR DE PUERTO RICO MORTGAGE COUNSELING AND BANKRUPTCY (762) PO BOX 362708 SAN JUAN PR 00936-2708	(3925842) (cr)
COMENITY BANK / WEST ELM 4590 E BROAD ST COLUMBUS OH 43213	(3925843) (cr)
COOP A/C SAN BLAS DE COAMO PO BOX 319 COAMO PR 00769	(3925844) (cr)
EUDELIZ SANTIAGO RODRIGUEZ URB. LAS ANTILLAS D-10 CALLE SANTO DOMINGO SALINAS PR 00751	(3925840) (cr)
MIDLAND FUND 8875 AERO DR. STE 200 SAN DIEGO CA 92123	(3925845) (cr)
ORIENTAL BANK ANGEL M. VAZQUEZ BAUZA PO BOX 195115 SAN JUAN PR. 00919-5115	(3954514) (cr)
ORIENTAL BANK & TRUST PO BOX 191429 SAN JUAN PR 00919-1429	(3925846) (cr)
Quantum3 Group LLC as agent for Worldwide Asset Purchasing II LLC	(3955807) (cr)

PO Box 788 Kirkland, WA 98083-0788

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